

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

BUILDERS ASSOCIATION OF
METROPOLITAN PITTSBURGH,

Plaintiff,

v.

CITY OF PITTSBURGH; *et al.*,

Defendants.

Civil Action

No. 2:22-cv-706-RJC

Judge Robert J. Colville

DECLARATION OF CHRISTINA HOWELL

Pursuant to 28 U.S.C. § 1746, I, Christina Howell, hereby declare as follows:

1. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.

2. I am over eighteen years of age and am otherwise competent to testify.

3. I am the Executive Director of Bloomfield Development Corporation. I have served in that role since 2014.

4. Bloomfield Development Corporation (“BDC”) is the Registered Community Organization (RCO) for the Bloomfield neighborhood. BDC works to build a thriving, diverse community through equitable engagement.

5. BDC’s membership includes all residents, businesses, community organizations, and property owners in the Bloomfield. The 2020 Census identified the Bloomfield Residential Population as 8665 people, all of whom are counted among BDC’s members. There are about 180 businesses in Bloomfield.

6. BDC carries out its mission via four primary program areas: housing; mobility &

infrastructure; business district support; and a farmers market. As the RCO for the neighborhood, BDC is tasked with convening public meetings to allow neighbors to provide feedback on and ask questions about proposed development projects in the neighborhood. The majority of BDC's public meetings focus on affordable housing, mobility, and infrastructure associated with new development.

7. To support the business district, BDC focuses on supporting small and locally owned businesses, many of which are employers of neighborhood residents. BDC hosts monthly Second Saturday events, networking events for business owners, and provides assistance with outdoor dining expansion.

8. To promote food access in the neighborhood, BDC hosts a Saturday Market nearly year round. The summer market features 51 vendors, and the market averages over \$1500 in SNAP and Food Bucks redeemed each market.

9. To promote affordable housing, BDC has participated in multiple initiatives. BDC offers resource navigation assistance to neighbors struggling with housing costs and has granted over \$10,000 in direct assistance funds through a Neighbors In Need program. BDC is currently seeking conservatorship of a residential property in the neighborhood with the aim of establishing the first Community Land Trust home in Bloomfield. In every new development of units in any amount in Bloomfield, BDC advocates for the inclusion of affordable units.

10. BDC has long advocated for inclusionary zoning ("IZ") as a means to preserve affordability. Bloomfield is in need of affordable housing as part of proposed and anticipated developments in the neighborhood. As such, the expansion of IZ to Bloomfield has been an organizational priority since 2019. BDC has dedicated staff time and resources to advancing IZ. BDC staff and board members testified at multiple meetings and hearings in support of the original

IZ Ordinance in Lawrenceville. BDC then advocated for the expansion of IZ to Bloomfield and the passage of the Inclusionary Zoning Ordinance (“IZO”) at issue in this litigation. BDC testified at hearings both before City Council and the Pittsburgh Planning Commission; held community meetings to educate the public about the IZO; and supported board members and residents to submit their own testimony in support of the IZO.

11. In light of its extensive efforts to secure affordable housing in Bloomfield, BDC has an interest in the litigation and in defending the IZO, which will directly benefit residents of Bloomfield and BDC’s members.

12. If the IZO were overturned, BDC’s extensive efforts and expenditure of resources to advance IZ would be lost. The significant need for affordable housing in the neighborhood would remain unmet. Lifelong lower-income Bloomfield residents and members of BDC would be displaced as they are unable to afford the kind of high-end developments currently being built in the East End of Pittsburgh. Forced to relocate in the absence of affordable housing, displaced families will face higher household costs when they have to start paying for transportation to reach jobs and healthcare.

13. This lawsuit has already forced BDC to divert resources and staff time from its ongoing projects focused on affordable housing, as well as BDC’s work addressing food access and business development. Consuming staff time and energy, this diversion of resources has tangible consequences for the Bloomfield community. Defending the IZO will likely mean BDC incurs costs that were unbudgeted for 2022.

14. If the IZO is overturned, BDC will have to divert further resources to change its messaging and re-educate members and the public, to support members and Bloomfield residents in need of affordable housing in the absence of units that would have otherwise become available

under the IZO, and to educate and update developers in Bloomfield. This additional but necessary work would limit BDC's capacity to simultaneously work on food access and business development.

15. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of August, 2022, in Pittsburgh, Pennsylvania.



Christina Howell